

CENTENNIAL COMMUNICATIONS

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May 1, 2007

Kris Monteith, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Room 7-C723
Washington, DC 20554

Fred Campbell, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Seventeenth Quarterly Report of
Centennial Communications Corp. on E911 Compliance**

Dear Ms. Monteith and Mr. Campbell:

Pursuant to the FCC's *Order to Stay* issued in CC Docket No. 94-102,¹ and the FCC's *Order* issued in WT Docket No. 05-314,² Centennial Communications Corp. ("Centennial") hereby files this seventeenth Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Centennial filed its last quarterly progress report on February 1, 2006. Because Centennial provides CMRS service both in and outside of the continental United States, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico and the U.S. Virgin Islands, and the second part reports on Phase II E911 deployment in our domestic markets. In addition, we are attaching the Excel spreadsheet detailing our E911 implementation status.³

I. Puerto Rico/U.S. Virgin Islands

¹ FCC 02-210, released July 26, 2002.

² FCC 06-65, released January 5, 2007, ¶ 19 (*hereinafter* "the January 5 Order").

³ *See Public Notice, Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, released June 6, 2003.

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 – Puerto Rico/US Virgin Islands. Although Centennial initially deployed a network-based solution to effectuate E911 service in Puerto Rico, Centennial has since initiated a complete upgrade of its system there. As part of that overhaul, Centennial has upgraded from Lucent to Nortel switches, effectively replacing its entire network. Consequently, Centennial necessarily switched from a network- to a handset-based solution for the provision of E911 services, thus potentially increasing the overall system reliability and accuracy with which subscribers can be located in an emergency, through use of GPS-enabled devices in individual handsets.

Centennial provides both Phase I and Phase II E911 service on Puerto Rico. With respect to the switch to a handset-based solution, Centennial worked closely with the PSAP in Puerto Rico to make sure that the PSAP's needs were met as soon as practicable. Significantly, Centennial committed to maintaining its network-based E911 solution, concurrent with adapting to a handset-based solution, until December 31, 2006. As of April 25, 2007, Centennial's GPS-capable handset penetration rate had reached 98.46%.

Centennial also provides service to the U.S. Virgin Islands of St. Croix and St. Thomas under its B Block license for MTA 25. Each island is served by a single PSAP; however at this point, neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

Domestic Markets

Through five different subsidiaries,⁴ Centennial now holds licenses to provide digital cellular and PCS service in 34 markets in the Midwest and Southern United States. Centennial provides CMRS in the following six states: Indiana, Louisiana, Michigan, Mississippi, Ohio and Texas. Centennial utilizes both TCS and Intrado as its E911 partners and has chosen a network-based solution offered by Andrew Corporation to deploy Phase II E911 in its domestic markets.⁵

⁴ Baucse Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

⁵ *See* Centennial Communications Corp. Amended Report on E911 Reporting Requirements, filed September 9, 2002.

Phase I Service – Centennial continues to make significant progress initiating Phase I service to PSAPs. To date, we have initiated Phase I E911 service to 152 PSAPs in our domestic markets. As we have previously reported, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. Phase I E911 service has been fully deployed in our existing Indiana, Michigan and Texas markets. To date, we have received three valid requests for Phase I E911 service from PSAPs in the state of Ohio. Since the filing of our last report, Phase I service has been initiated to Delaware County, Indiana, Defiance County, Ohio and Winn Parish, Louisiana. We expect to implement Phase I service to PSAPs in Williams County, Ohio early this month. Integration with the PSAP in Williams County was delayed after the local exchange carrier moved the selective router, and new trunks had to be ordered. Finally, we are working on implementing Phase I requests for Franklin Parish, LA and Jefferson County, Mississippi.

Phase II Service - We are implementing Andrew Corporation's "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets. Since the filing of our last quarterly report, Centennial has activated one new PSAP to Phase II compliance (Henry County, Indiana). In total, we have integrated eighty-five PSAP markets into a "Live" status, and we have nine markets in various stages of the implementation process. Over the past three months, we have received two new requests for Phase II service (Beauregard and Winn Parishes in Louisiana).

Centennial continues to experience deployment difficulties in two central Michigan counties - Ogemaw and Roscommon - due to lack of cell site density. While Phase II implementation was attempted, it was unsuccessful due to accuracy issues. (In order to complete triangulation, non-radio equipped sites are strategically placed in order to locate distress calls.) In order to improve accuracy to an acceptable level, we made site adjustments and are deploying equipment at five Phase II GEO-only sites. Since our last report, we completed initial hardware installation at three of the sites in Roscommon and Ogemaw counties; however, we now must add amplification and filtering hardware to these sites in order for the newly-installed hardware to function properly. Consequently, we now expect integration of both counties to be completed by mid-May. In addition, we have completed construction at the two additional GEO-only sites, and installation of 911 equipment is to commence at both sites this month. While this is a time-consuming process, which is further complicated by the lack of cell tower sites in the region, we remain in regular contact with the affected PSAP directors, and they have not objected to our revised deployment schedule.

Centennial has successfully integrated all Texas PSAPs to Phase II status that have requested Phase II service. Presently, we have no pending Phase II E911 service requests for Ohio and two pending Phase II requests from PSAPs in Mississippi. The Defiance County, OH PSAP has rescinded its Phase II request due to equipment issues. In Mississippi, we have pending Phase II requests from the Simpson and Jefferson County PSAPs. As with the Michigan sites, Centennial is experiencing implementation issues in these two counties due to lack of cell site density. Accordingly, in Simpson County, Centennial intends to install three GEO-only sites in order to resolve the implementation issues. The three sites have been identified and leases are in process for these sites. Jefferson County also will require two GEO-only sites in order to be Phase II compliant. Finally, Centennial has pending requests from PSAPs in Newton and Delaware Counties in Indiana and Franklin, Madison and Tangipahoa Parishes in Louisiana. Centennial continues to work cooperatively with PSAPs when we encounter issues that result in delays to the previously-negotiated mutually acceptable deployment dates.

In sum, Centennial is presently in compliance with all applicable Phase II deployment benchmarks, either through meeting the six-month deadline, or negotiating mutually acceptable alternative deployment dates. Phase I & II implementation remain a high priority with Centennial for each of the PSAPs in its domestic markets. Centennial will continue to work cooperatively with PSAPs to deliver the requested service in a timely and efficient manner.

III. Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

If you have any questions regarding this report, or require additional information, please contact me.

Sincerely,

/s/ William Roughton

William Roughton
Vice President, Legal and Regulatory

Affairs

Centennial Communications Corp.

Kris Monteith
Fred Campbell
May 1, 2007
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